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ASSOCIATION and MARK RYAVEC

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

<i>In the matter of:</i>  Venice Main Post Office Venice, California 90291 (Mark Ryavec and Venice Stakeholders Association, Petitioners)	Docket No. A2012-17
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**MOTION REQUESTING AN EXTENSION OF TIME TO FILE PETITIONERS' INITIAL  
BRIEF**

Pursuant to Rule 16 of the Postal Regulatory Commission's Rules of Practice and Procedure, petitioners Venice Stakeholders Association and Mark Ryavec (collectively "Venice Stakeholders"), by counsel, respectfully move for an extension of time of two weeks in which to file their Initial Brief in support of their petition for review of the United States Postal Service decision to close the Venice Main Post Office, making the new deadline December 5, 2011. The Venice Stakeholders believe good cause exists for this extension for the following two reasons.

First, the Postal Regulatory Commission's Notice and Order Accepting Appeal and Establishing Procedural Schedule set a deadline for the Venice Stakeholders' initial brief on November 21, 2011. Because of the financial limitations of the Venice Stakeholders they sought the assistance of pro bono counsel, which they were not able to obtain until November 9, 2011. Due to the short amount of time between obtaining pro bono counsel and the deadline for the Initial Brief, the Venice Stakeholders believe good cause exists for an extension of time.

Second, according to the Procedural Schedule, the Postal Service was required to file the applicable administrative record by November 1, 2011. As of November 14, 2011, the administrative record still has not been filed.<sup>1</sup> The Venice Stakeholders believe that the failure to file the administrative record provides good cause to extend the deadline because reviewing the administrative record is essential for the Venice Stakeholders to formulate their initial brief.

WHEREFORE, Venice Stakeholders Association and Mark Ryavec respectfully request a two-week extension until December 5, 2011 to file their initial brief.<sup>2</sup>

DATED: November 14, 2011

/s/ Julie Kimball  
JULIE KIMBALL  
Attorney for Petitioners  
VENICE STAKEHOLDERS ASSOCIATION  
and MARK RYAVEC

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<sup>1</sup> Venice Stakeholders are filing a motion concurrently herewith requesting that the Postal Service be required to file the administrative record.

<sup>2</sup> A December 5, 2001 deadline should provide enough time to incorporate the administrative record once the Postal Service files it; however, if the Postal Service does not file the record by November 28, the Venice Stakeholders request at least one week to file the initial brief after receiving the administrative record.